## **HCPHES Comments (10/7/10)**

Draft Soil and Sampling and Analysis Plan (SAP): Soil Study September 2010 San Jacinto Waste Pits Superfund Site

## Comment 1: Section 1.8.1.2 Sample Collection Design - Background Conditions (pg 20)

One of the four proposed background locations depicted on figure 5 is River Terrace Park. River Terrace Park was heavily impacted by gasoline, diesel and crude oil from pipeline releases that occurred during the October 1994 Flood and Fire. Although the impacted areas were remediated I would suggest excluding the River Terrace Park site as a background location.

## Comment 2: Section 1.8.1.2 Analytical Approach - Sample Depth and Analysis (pg 20)

The SAP proposes to characterize the nature and extent of the soil contamination in Areas 1 through 3 by sampling and analyzing samples collected from the two surface intervals, 0-.8 inch and .8-12 inch. An additional 12-24 inch sample will be collected and archived pending the analytical outcome of the shallower intervals. My concern is that the fill record for the study area is incomplete and that additional unrelated fill material may have been deposited on top of the sediments from the MIMC site. If additional fill material had been deposited, soil samples collected at one foot or less may not include the previously deposited paper mill waste.